

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

GORRELL DAIRY LLC
GLENN D. GORRELL
ROBIN J. GORRELL
(Jointly Administered)

Debtor(s)

GORRELL DAIRY LLC
GLENN D. GORRELL
ROBIN J. GORRELL

Plaintiff(s)/Movant(s)

vs.

FIRST CITIZENS COMMUNITY BANK;
CARGILL, INC.; WILLIAM G. SCHWAB,
TRUSTEE; DEERE & COMPANY;
GROWMARK FS; USDA FARM SERVICE
AGENCY

Defendant(s)/Respondent(s)

CHAPTER 12

CASE NO. 5 - 18 -bk- 05275

ADVERSARY NO. - - ap-
(if applicable)

Nature of Proceeding: Chapter 12 Plan

Confirmation Hearing

Document #: 70

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Debtors require additional time to formulate an amended plan and income and expense projections to address objections to confirmation filed by Respondents. Debtor are also requesting and extension of time under 11 U.S.C. Section 1224, for conclusion of a hearing on confirmation, to and including July 31, 2019.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: June 26, 2019


Attorney for Debtors

Name: David H. Ealy, Esq.

Phone Number: (585) 784-1448

¹ No alterations or interlineations of this document are permitted.